

# **EXHIBIT A**

**CONFIDENTIAL**



## Transcript of **Gene Steinberg**

Monday, May 9, 2022

*National Coalition on Black Civic Participation, et al.  
v. Jacob Wohl, et al.*

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Reference Number: 115545

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,  
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH  
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and  
ANDREA SFERES,

7 Plaintiffs, Civil Action No.  
8 1:20-cv-08668-VM-OTW  
9 -and-

10 People of the STATE OF NEW YORK, by its Attorney  
11 General, LETITIA JAMES, ATTORNEY GENERAL OF THE  
STATE OF NEW YORK

12 -vs-

13 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,  
14 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,  
ROBERT MAHANIAN and JOHN and JANE DOES 1-10

15 Defendants.  
16 -----  
17

18 Deposition of GENE STEINBERG, Plaintiff,  
19 herein, taken by Defendant, pursuant to Notice via  
20 Zoom, on Monday, May 9, 2022, at 10:00 a.m., before  
21 Deirdre Smith, a stenographer and notary public  
22 within and for the State of New York.  
23  
24  
25

1 A P P E A R A N C E S

2

3 ORRICK HERRINGTON & SUTCLIFFE, LLP

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6 Appearing on behalf of the Plaintiff

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10 BY: BRITTANY ROEHRS, ESQ.

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1 A P P E A R A N C E S (continued)

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4 Appearing on behalf of Plaintiff

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8 BY: MARC EPSTEIN, ESQ.

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17 BY: COLLEEN FERITY, ESQ.

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1 MS. ROEHRS: Objection.

2 A. No.

3 Q. What involvement, if any, do you have with  
4 the Democrat party?

5 MS. ROEHRS: Objection.

6 A. What do you mean by involvement?

7 Q. Are you involved in any local Democrat  
8 party politics, anything like that?

9 A. No.

10 Q. When you were last registered to vote,  
11 were you registered as a Democrat, Republican or  
12 something different?

13 MS. ROEHRS: Objection.

14 A. As a Democrat.

15 Q. Who did you vote for in the November 2020  
16 presidential election for the office of president?

17 MS. ROEHRS: Objection.

18 THE WITNESS: Do I have to answer?

19 MS. ROEHRS: Yes.

20 A. Biden/Harris.

21 Q. Is it fair to say that you were happy with  
22 the result of the 2020 presidential election?

23 A. No.

24 Q. Why not?

25 A. I thought it was too close. I wish it